

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and
MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

**JOINT STIPULATED MOTION TO
REVISE CASE SCHEDULE**

**NOTE ON MOTION CALENDAR:
December 31, 2013**

The parties have conferred and agreed that the case schedule should be slightly modified in order to allow for the completion of party and third-party discovery prior to the deadline for opening expert reports. The requested modifications continue the deadlines for opening and rebuttal expert reports by 10 days and one week, respectively, and continue the deadlines for close of discovery and dispositive motions by one week only. Under the parties' stipulated schedule, the dates for motions in limine, pretrial procedures, and trial remain intact. There is good cause to modify the existing case schedule, as the parties will be able to complete certain depositions and additional discovery that was delayed by the holidays in time for inclusion in opening expert reports. This will allow those reports to be more comprehensive, rendering the remainder of the discovery period more productive and useful. The parties therefore respectfully move the Court to enter the revised deadlines set out in Exhibit 1.

1 Dated: December 31, 2013

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Counsel for Defendant

It is so ordered.

JUDGE BENJAMIN H. SETTLE
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on December 31, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who have registered for electronic notifications, and I caused the foregoing to be served upon the following by email:

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Dated: December 31, 2013

By: /s/ Bianca Nealious

Exhibit 1

<u>Event</u>	<u>Current Deadline</u>	<u>Revised Deadline</u>
Opening expert reports	1/10/14	1/20/14
Rebuttal expert reports	2/14/14	2/21/14
All motions related to fact discovery must be filed	2/7/14	2/14/14
Expert depositions	2/24/14 – 3/7/14	2/26/14 – 3/12/14
Close of fact and expert discovery	3/7/14	3/14/14
Dispositive Motion (and <i>Daubert</i> Motion) Deadline	3/20/14 (motions noted for 4/11/14)	3/27/14 (motions noted for 4/18/14)
Motions in limine	5/12/14 (motions noted for 5/23/14)	5/12/14 (motions noted for 5/23/14)
Agreed pretrial order, trial briefs, proposed voir dire, and jury instructions due	5/27/14	5/27/14
Pretrial conference	6/2/14	6/2/14
Trial Begins	6/16/14	6/16/14